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13 UNITED STATES DISTRICT COURT

14 DISTRICT OF ARIZONA

15 In Re Bard IVC Filters Products  
16 Liability Litigation

No. MD-15-02641-PHX-DGC

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21 **JOINT MOTION TO EXTEND  
ALLOTTED TIME FOR SEALING  
DOCUMENTS RELATED TO  
PLAINTIFFS' NOTICE OF LODGING  
DOCUMENTS UNDER SEAL FOR  
PLAINTIFFS' CONTROVERTING  
STATEMENT OF FACTS IN  
OPPOSITION TO BARD'S MOTION  
FOR SUMMARY JUDGMENT  
REGARDING PREEMPTION**

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23 Parties submit this Joint Motion to Extend Time Allotted for Sealing Documents  
24 Related to Plaintiffs' Notice of Lodging Documents Under Seal for Plaintiffs'  
25 Controverting Statement of Facts In Opposition to Bard's Motion for Summary Judgment  
26 Regarding Preemption [Doc. 7374].

27 Plaintiffs failed to lodge with the Court the exhibits associated with Dr. Kessler's  
28 Second Supplemental Report (Exhibit 3). Plaintiffs file concurrently with this Motion a

1 Verified Notice of Errata to Plaintiffs' Controverting Statement of Facts in Opposition to  
2 Bard's Motion for Summary Judgment Regarding Preemption and will lodge the  
3 substituted Exhibit 3 to Plaintiffs' Controverting Statement of Facts In Opposition to  
4 Bard's Motion for Summary Judgment Regarding Preemption [Doc. 7374] in accordance  
5 with Protective Order and LRCiv 5.6(d).

6 The parties stipulate to extend the allotted fifteen (15) day requirement, as defined  
7 in the Protective Order [Doc. 260-1] and consistent with LRCiv 5.6(d), to allow  
8 Defendants to review the additional exhibits to be lodged under seal. Parties have agreed  
9 to an extension of one (1) week with a due date of Friday, September 22<sup>nd</sup>.

10 RESPECTFULLY SUBMITTED this 15<sup>th</sup> day of September 2017.

11 GALLAGHER & KENNEDY, P.A.

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5 *Counsel for C. R. Bard, Inc. and Bard*  
6 *Peripheral Vascular, Inc.*

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8 **CERTIFICATE OF SERVICE**

9 I hereby certify that on this 15<sup>th</sup> day of September 2017, I electronically transmitted  
10 the attached document to the Clerk's Office using the CM/ECF System for filing and  
11 transmittal of a Notice of Electronic Filing.

12 /s/ Deborah Yanazzo

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